

Appl. No. : **10/612,395**
Filed : **July 2, 2003**

SUBSTANCE OF INTERVIEW

On May 17, 2006, Applicants' representative, Ronald Schoenbaum, conducted a telephone interview with Examiner Burgess to discuss the outstanding Office Action. During the interview, Mr. Schoenbaum pointed out specific examples of limitations in independent claim 1 that, in Applicants' position, are not disclosed by the Hentzel patent. For example, Mr. Schoenbaum identified the following claim limitations as not being disclosed: "wherein the event history server... makes such event data available in real time to the one or more applications to facilitate personalization of web pages for the users," and "wherein the event history server implements a query interface through which the one or more applications retrieve the event data associated with particular users by event type and by event time of occurrence." No other claims, references, or issues were discussed, and no exhibits were shown. No agreement was reached.

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REMARKS

By the foregoing amendments, Applicants have revised Claim 1 to clarify that the recited query interface may support the retrieval of event data based on criteria other than event type and event time of occurrence. In addition, Applicants have added three new dependent claims. No new matter has been added by this amendment.

I. Anticipation Rejection of Claims 1 6, 9-12, 46 and 47

In the Office Action, the Examiner rejected independent Claim 1, and Claims 6, 9-12, 46 and 47 which depend from Claim 1, as being anticipated under section 102(e) by U.S. Patent No. 6,877,007 (hereinafter "Hentzel"). Applicants respectfully submit that the anticipation rejections are improper because, among other reasons, Hentzel does not explicitly or inherently disclose all of the limitations of independent Claim 1. For example, Hentzel does not disclose a "web server system [that] includes one or more applications that generate personalized content for recognized users based on browse histories of such users," in combination with an "event history server [that] stores the event data substantially as corresponding events occur, and makes such event data available in real time to the one or more applications to facilitate personalization of web pages for the users."

In Hentzel, a user's interactions with a web page are reported to, and recorded by, a tracking server 40. At some later time, the recorded sequence or "session" of interactions is replayed by a viewer application 96 under the control of a human operator, such as a web site developer. This enables the operator/developer to assess how users interact with the web page, and to modify the page's design accordingly. This viewer application 96 does not satisfy the "one or more applications" limitation of Claim 1 because, for example, it does not "generate personalized content for recognized users based on browse histories of such users."

Even if the viewer application 96 were treated as the "one or more applications" recited in Claim 1, the following limitations still would not be met: "wherein the event history server... makes such event data available in real time to the one or more applications." In this regard, Hentzel's tracking server apparently does not make the recorded event data available to the viewer application 96 until a human operator manually initiates the playback of an associated session. See Hentzel at col. 10, lines 23-41. Although Hentzel uses the term "real time" at col. 10, line 36, Hentzel uses this term to refer to the speed at which the sequence of events is

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replayed for viewing by the human operator, and not to the speed or latency with which the event data is made available to the viewer application.

The anticipation rejection of Claim 1 is also improper because Hentzel does not disclose the following limitations: "wherein the event history server implements a query interface through which the one or more applications retrieve the event data associated with particular users at least by event type and event time of occurrence." To the contrary, in Hentzel's system, the human operator selects the session he/she wants to replay, and the viewer application then apparently retrieves and replays this session. Nothing in Hentzel suggests that this process involves the use of a query interface as defined in Claim 1.

For the foregoing reasons, Applicants respectfully submit that the anticipation rejections of Claims 1, 6, 9-12, 46 and 47 are improper.

Additional distinctions over Hentzel are recited in the rejected dependent claims. For example, Claim 6 adds that "the event history server comprises a plurality of mirrored storage layer servers that persistently store like event data by user ID." Yet nothing in Hentzel suggests the existence of a plurality of mirrored storage layer servers.

As another example, Claim 10 adds that "the event history server records impression event data indicative of specific items presented to users on dynamically generated web pages." Nothing in Hentzel, however, suggests that the web pages at issue are generated dynamically, or that the tracking server records impression event data indicative of specific items presented to users on such web pages.

II. Obviousness Rejection of Claims 2-5, 7, 8 and 13

The Examiner rejected Claims 2-5, 7, 8 and 13 on obviousness grounds over Hentzel in view of U.S. Pat. Pub. 2002/0063735 ("Tamir"). All of these claims depend from Claim 1. Applicants respectfully submit that the rejections of these claims are improper because Hentzel and Tamir do not teach or suggest all of the limitations of Claim 1, and particularly those discussed above.

In addition, Applicants respectfully submit that the obviousness rejection of Claims 2-5, 7, 8 and 13 is improper because Hentzel and Tamir do not teach or suggest all of the limitations added by these claims. For example, with respect to Claim 3, Hentzel and Tamir do not teach or suggest an event history server that "includes at least one storage layer server that stores the event

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data persistently by user ID, and further includes at least one cache layer server that caches event data of online users.” In this regard, neither reference even mentions the caching of event data.

As another example, Hentzel and Tamir do not teach or suggest the following limitations of Claims 7 and 8, respectfully: “wherein the query interface of the event history server supports queries of the form ‘has User X accessed URL Y?’” and “wherein the query interface of the event history server supports queries of the form ‘when has User X accessed URL Y?’” In connection with these limitations, the Examiner relies on Tamir’s teaching of an Application Information Record that includes a Client Query Time Interval Field. It is not clear, however, how the Examiner is relying on this teaching of Tamir to arrive at the claim limitations at issue.

III. Conclusion

In view of the foregoing amendments and remarks, Applicants request that the Examiner withdraw the rejections of Claims 1-13, 46 and 47.

By focusing on specific claims and claim limitations in the discussion above, Applicants do not imply that other claim limitations are taught or suggested by the references. Further, by pointing out distinctions over Hentzel and Tamir, Applicants do not admit that these references are prior art.

If any issues remain which can potentially be resolved by telephone, the Examiner is invited to call the undersigned attorney of record at his direct dial number of 949-721-2950.

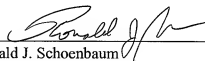
Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: _____

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By: _____


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